

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JANE DOE 1, individually and on behalf of
all others similarly situated,

Plaintiff,

v.

JP MORGAN CHASE BANK, N.A.,

Defendant.

Case No. 22-cv-10019 (JSR)

**DECLARATION OF FELICIA H. ELLSWORTH
IN SUPPORT OF JPMORGAN CHASE BANK, N.A.'S OPPOSITION TO
PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

Pursuant to 28 U.S.C. § 1746, I, Felicia H. Ellsworth, declare under penalty of perjury as follows:

1. I am a member in good standing of the bar of the Commonwealth of Massachusetts. I am one of the attorneys representing Defendant JPMorgan Chase Bank, N.A. ("JPMC") in the above-captioned action and have been admitted to this Court pro hac vice. I am a Partner with the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, 60 State Street, Boston, Massachusetts 02109. I am familiar with the facts set forth herein, and if called as a witness, I could and would competently testify thereto.
2. Attached as Exhibit 1 is a true and correct copy of a press release by the Epstein Victims' Compensation Program ("EVCP") titled "Renowned Claims Resolution Experts Announce Commencement of the Epstein Victims' Compensation Program," dated June 25, 2020, available at <https://www.epsteinvcp.com/documents/6>.
3. Attached as Exhibit 2 is a true and correct copy of excerpts from a book by Bradley J. Edwards titled "Relentless Pursuit" published in 2021.

4. Attached as Exhibit 3 is a true and correct copy of an article titled “A federal court just released the settlement deal between Epstein and Giuffre,” dated January 3, 2022, available at <https://www.npr.org/2022/01/03/1069887001/jeffrey-epstein-virginia-giuffre-settlement-deal>.
5. Attached as Exhibit 4 is a true and correct copy of a Department of Justice Press Release dated June 28, 2022, available at <https://www.justice.gov/usao-sdny/pr/ghislaine-maxwell-sentenced-20-years-prison-conspiring-jeffrey-epstein-sexually-abuse>.
6. Attached as Exhibit 5 is a true and correct copy of a Department of Justice Press Release dated July 8, 2019, available at <https://www.justice.gov/usao-sdny/pr/jeffrey-epstein-charged-manhattan-federal-court-sex-trafficking-minors>.
7. Attached as Exhibit 6 is a true and correct copy of the indictment filed July 2, 2019, in *United States v. Epstein*, 19-cr-00490 (S.D.N.Y.).
8. Attached as Exhibit 7 is a true and correct copy of the second superseding indictment filed March 29, 2021, in *United States v. Maxwell*, 20-cr-00330 (S.D.N.Y.).
9. Attached as Exhibit 8 is a true and correct copy of the Fifth Amended Complaint filed February 3, 2021, in *Doe 1 v. Epstein*, 19-cv-07675 (S.D.N.Y.).
10. Attached as Exhibit 9 is a true and correct copy of the transcript of the June 28, 2022 sentencing proceeding in *United States v. Maxwell*, 20-cr-00330 (S.D.N.Y.).
11. Attached as Exhibit 10 is a true and correct copy of the First Amended Complaint filed January 6, 2020, in *Katlyn Doe v. Indyke*, 19-cv-07771 (S.D.N.Y.).
12. Attached as Exhibit 11 is a true and correct copy of a list of lawsuits filed against Jeffrey Epstein and related associates and entities prepared by attorneys at WilmerHale.

13. Attached as Exhibit 12 is a true and correct copy of a document [REDACTED]
[REDACTED], designated confidential pursuant to
the Protective Order in this matter and filed under seal.
14. Attached as Exhibit 13 is a true and correct copy of a document [REDACTED]
[REDACTED], designated confidential pursuant to
the Protective Order in this matter and filed under seal.
15. Attached as Exhibit 14 is a true and correct copy of a document [REDACTED]
[REDACTED], designated confidential pursuant to
the Protective Order in this matter and filed under seal.
16. Attached as Exhibit 15 is a true and correct copy of a document [REDACTED]
[REDACTED], designated confidential pursuant to
the Protective Order in this matter and filed under seal.
17. Attached as Exhibit 16 is a true and correct copy of a document [REDACTED]
[REDACTED], designated confidential pursuant to the
Protective Order in this matter and filed under seal.
18. Attached as Exhibit 17 is a true and correct copy of a document [REDACTED]
[REDACTED], designated confidential pursuant to the
Protective Order in this matter and filed under seal.
19. Attached as Exhibit 18 is a true and correct copy of a document [REDACTED]
[REDACTED], designated confidential pursuant to the
Protective Order in this matter and filed under seal.
20. Attached as Exhibit 19 is a true and correct copy of a document [REDACTED]
[REDACTED], designated confidential pursuant to the
Protective Order in this matter and filed under seal.

21. Attached as Exhibit 20 is a true and correct copy of a document [REDACTED], designated confidential pursuant to the Protective Order in this matter and filed under seal.
22. Attached as Exhibit 21 is a true and correct copy of a document [REDACTED], designated confidential pursuant to the Protective Order in this matter and filed under seal.
23. Attached as Exhibit 22 is a true and correct copy of a document [REDACTED], designated confidential pursuant to the Protective Order in this matter and filed under seal.
24. Attached as Exhibit 23 is a true and correct copy of a document [REDACTED], designated confidential pursuant to the Protective Order in this matter and filed under seal.
25. Attached as Exhibit 24 is a true and correct copy of Exhibit 4 of the March 15, 2023 deposition of Mary Erdoes, designated confidential pursuant to the Protective Order in this matter and filed under seal.
26. Attached as Exhibit 25 is a true and correct copy of excerpts of the transcript of the March 3, 2023 deposition of Jane Doe 1, designated confidential pursuant to the Protective Order in this matter and filed under seal.¹
27. Attached as Exhibit 26 is a true and correct copy of excerpts of the transcript of the May 2, 2023 deposition of Jordana H. Feldman, the administrator of the EVCP, designated highly confidential attorneys' eyes only pursuant to the Court's order on March 24, 2023 [Dkt. No. 70], and filed under seal.

¹ All proper names other than Jeffrey Epstein's are redacted from the sealed version in order to ensure confidentiality and privacy of the victims.

28. Attached as Exhibit 27 is a true and correct copy of excerpts of the transcript of the April 27, 2023 deposition of Dr. Kimberly Mehlman-Orozco, designated confidential pursuant to the Protective Order in this matter and filed under seal.
29. Attached as Exhibit 28 is a true and correct copy of excerpts of the transcript of the May 2, 2023 deposition of Jane Khodarkovsky, designated confidential pursuant to the Protective Order in this matter and filed under seal.
30. Attached as Exhibit 29 is a true and correct copy of the Expert Report of Dr. Matthew W. Norman, dated April 13, 2023, designated confidential pursuant to the Protective Order in this matter and filed under seal.
31. Attached as Exhibit 30 is a true and correct copy of the Expert Report of Jane Khodarkovsky, dated March 1, 2023, designated confidential pursuant to the Protective Order in this matter and filed under seal.
32. Attached as Exhibit 31 is a true and correct copy of the Reply Expert Report of Jane Khodarkovsky, dated April 24, 2023, designated confidential pursuant to the Protective Order in this matter and filed under seal.
33. Attached as Exhibit 32 is a true and correct copy of the Expert Report of Dr. Kimberly Mehlman-Orozco, dated April 13, 2023, designated confidential pursuant to the Protective Order in this matter and filed under seal.
34. Attached as Exhibit 33 is a true and correct copy of a document [REDACTED], designated highly confidential attorneys' eyes only pursuant to the March 24 Order, and filed under seal.
35. Attached as Exhibit 34 is a true and correct copy of a document [REDACTED], designated confidential pursuant to the Protective Order in this matter.

36. Attached as Exhibit 35 is a true and correct copy of [REDACTED]
[REDACTED], designated highly confidential attorneys' eyes only pursuant to the March 24 Order, and filed under seal. A courtesy electronic copy has been emailed to the Court.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 12, 2023

/s/ Felicia Ellsworth
Felicia H. Ellsworth